

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

MICHAEL ZHAO, DEAN MARRIOTT,  
and MARY KAY PECK, individually  
and on behalf of others similarly situated,

Plaintiffs,

vs.

VOLKSWAGEN GROUP OF  
AMERICA, INC., a New Jersey  
Corporation, d/b/a VOLKSWAGEN OF  
AMERICA, INC., AUDI OF  
AMERICA, INC., VOLKSWAGEN AG,  
a German Corporation, and AUDI AG, a  
German Corporation,

Defendants.

Case No.: 2:21-cv-11251-  
MCA-MF

**CLASS ACTION**

**DECLARATION OF MATTHEW D. SCHELKOPF IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF THE CLASS ACTION SETTLEMENT**

I, Matthew D. Schelkopf, under penalty of perjury, declare as follows:

1. I am a partner at the law firm of Sauder Schelkopf LLC in Berwyn, Pennsylvania. I respectfully submit this Declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of the Class Action Settlement. My declaration is based on my personal knowledge of the facts

set forth herein, and, if called to so, could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the executed Settlement Agreement entered and agreed to by Plaintiffs and Defendant Volkswagen Group of America, Inc. on January 28, 2022:

- a. Attached to the Settlement Agreement as **Exhibit 1** are true and correct copies of the Claim Forms.
- b. Attached to the Settlement Agreement as **Exhibit 2** are true and correct copies of the proposed Class Notices.
- c. Attached to the Settlement Agreement as **Exhibit 3** is a true and correct copy of the proposed order granting preliminary approval.
- d. Attached to the Settlement Agreement as **Exhibit 4**, and to be submitted to the Court under seal at the Court's request, is the vehicle identification numbers of the Settlement Class Vehicles. The full VIN list is over 4,500 pages when listing approximately 500 VINs per page.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the firm resume of Sauder Schelkopf LLC.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: February 4, 2022

/s/ Matthew D. Schelkopf  
Matthew D. Schelkopf